

## REMARKS

Claims 1-23 are pending, with claims 1, 15, and 23 being independent. Claims 1 and 15 have been amended, and claims 21-23 have been added. No new matter has been added. In view of the following remarks, all of the claims should be allowed.

### Claim Rejections - 35 USC § 102

Claims 1-20 are rejected for allegedly being anticipated by Srikant et al. (U.S. Pub. 2003/0208460; Srikant). These rejections are traversed.

#### Background: 35 USC § 102

As an initial matter, section 102(e) appears to have been misinterpreted in the last official action. Arguments appear to have been deemed unpersuasive because of a "piecemeal interpretation" (Page 8 of official action). This section of the official action appears to articulate that arguments that focus on any missing disclosure of elements of claimed subject matter are not persuasive. This line of reasoning would overlook the purpose of section 102(e) and mischaracterize the law. Under section 102(e):

"A claim is anticipated **only if each and every element as set forth in the claim is found**, either expressly or inherently described, in a single prior art reference."

Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987; emphasis added). See also MPEP § 2131.

Thus, unless all elements of a claim are disclosed in a cited reference, a section 102 rejection should be withdrawn, as a matter of law.

#### Srikant Does Not Disclose Elements of the Independent Claims

Srikant does not disclose 1) a mapping tool to transform OLTP data not being processed by an OLAP engine or a BI platform to a data set in accordance with a common meta model and 2) integration of OLTP data not being processed by a BI platform with OLAP data in a report; thus, the rejections of claims 1 and 15 should be withdrawn.

#### Srikant

Srikant describes methods and systems to generate and link reports (Title). Requirements, such as business requirements, may be associated with objects used to

generate report specifications (Abstract; ¶ 31). The report specifications may then be used, with a data store schema, to generate report meta data ("specifications in XML format can be provided....for the automated processing of the specifications into report metadata...specifications are inputted into the additional tools along with a data store schema"; ¶ 32). As disclosed, an example data store is a Teradata warehouse distributed by NCR Corporation (¶ 35). With regards to OLTP data, Srikant appears to disclose that OLTP data may be transformed to an OLAP format and that OLAP data may be stored in an OLAP database (¶¶ 4-6).

No Mapping of OLTP Data Without Processing by BI Platform

Claims 1 and 15 include features directed to transforming OLTP data not being processed by an OLAP engine or a BI platform to a data set in accordance with a common meta model. For example, claim 1 recites, in part:

"a mapping tool to transform the OLTP data of the data sources not being processed by an OLAP engine or the BI platform to a first data set in accordance with a common meta model of a unified view module."

The data from the mapping tool may become part of a common meta model data set and be integrated with data that is processed by an OLAP engine. Advantageously, as data need not be processed by an OLAP engine or BI platform, overhead of a BI platform may be avoided when such processing is not necessary (See e.g., ¶ 46 of the present application). Thus, a mapping tool may advantageously assist integration of OLTP data to a common meta model without overhead associated with a BI platform. And, if OLAP analysis is required for report data, in implementations, data may be processed by the BI platform. For example, claim 1 recites, in part:

"if a report requests data or services from the data sources of the first data set, an OLAP engine does not process the OLTP data and if the report requests data or services from the BI platform, the data is processed by the BI platform."

In contrast to the claimed subject matter, the disclosure of OLTP data in Srikant focuses on deriving OLAP data from an OLTP data source (see ¶¶ 4-6). For example, data in a data warehouse (i.e., an OLAP database) is "gathered from various online transaction processing (OLTP) applications." Srikant does not disclose a mapping tool to transform OLTP data not being processed by an OLAP engine or BI platform to a data set

in accordance with a common meta model. Thus, the overhead associated with a BI platform can not be avoided with Srikant.

This difference is also significant, as, for example, an important aspect of implementations of the subject matter is integration of OLTP data with data from OLAP sources. For example, paragraph 0041 of the present application recites:

“...data in the BI platform 116 comes with a time lag between data creation and the data's availability for reporting. Hence, a data abstraction layer 106 on top of the data access layer 102 and service layer 104 integrates OLTP with OLAP reporting and leverages the benefits of both.”

Claims 21 and 22 are Patentable

In addition to the reasons stated above, claims 21 and 22 are also not anticipated by Srikant for at least the reason that they disclose features not in Srikant. In particular, claim 21 includes a feature directed to a unified view module not including information identifying sources of data in the common meta model data set such that a mapping of the data is not visible to a user of the common meta model data set. And, claim 22 includes features directed to a first and second integration path having first and second service qualities.

Thus, for at least the reasons above, independent claims 1 and 15 are not anticipated by Srikant and are allowable. As claims 2-14 and 21-22, and 16-20 depend directly, or indirectly, on independent claims 1 and 15, these claims are also allowable for at least the reasons above.

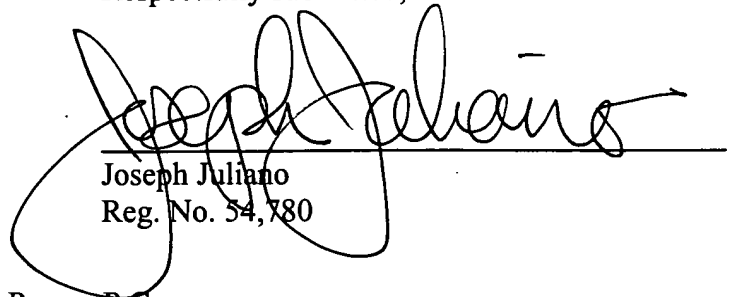
Conclusion

In view of the above amendments and remarks, all of the claims are in condition for allowance. A formal notice to that effect is respectfully requested.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment. Applicant asks that all claims be allowed.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. Enclosed is a check in the amount of \$150 for the excess claim fees. However, the Commissioner is hereby authorized to charge any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-082/P2003P00266US.

Respectfully submitted,



Joseph Juliano  
Reg. No. 54,780

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Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
9255 Towne Centre Drive, Suite 600  
San Diego, CA 92121  
**Customer No.: 64280**  
Tel.: 858/320-3031  
Fax: 858/320-3001